

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION**

STEPHANIE BAIYASI,

Plaintiff,

Case No. 11-cv-13094-TLL-CEB
Hon. Thomas L. Ludington

vs

DELTA COLLEGE and DAVID
BAILEY, in his individual and official
capacity, jointly and severally,

Defendants.

THE MASTROMARCO FIRM
VICTOR J. MASTROMARCO, JR. (P34564)
MANDA L. DANIELESKI (P62597)
Attorneys for Plaintiff
1024 North Michigan Avenue
Saginaw, Michigan 48602
(989) 752-1414

CUMMINGS, McCLOREY, DAVIS & ACHO, PLC
EILEEN K. HUSBAND (P38059)
Attorneys for Defendants
33900 Schoolcraft
Livonia, MI 48150
(734) 261-2400

**PLAINTIFF'S RESPONSE TO
DEFENDANTS' AFFIRMATIVE DEFENSES**

NOW COMES the Plaintiff, STEPHANIE BAIYASI, by and through her attorneys, THE MASTROMARCO FIRM, and for her Response to Defendants' Affirmative Defenses states as follows:

1. Denied as untrue.
2. Denied as untrue.
3. Denied as untrue.
4. Denied as untrue.
5. Denied as untrue.
6. Denied as untrue.
7. Denied as untrue.
8. Denied as untrue.
9. Denied as untrue.
10. Denied as untrue.
11. Denied as untrue.
12. Denied as untrue.
13. Denied as untrue.
14. Denied as untrue.
15. Denied as untrue.
16. Denied as untrue.
17. Denied as untrue.
18. Denied as untrue.
19. Denied as untrue.
20. Denied as untrue.
21. Denied as untrue.
22. Denied as untrue.

- 23. Denied as untrue.
- 24. Denied as untrue.
- 25. Denied as untrue.
- 26. Denied as untrue.
- 27. Denied as untrue.
- 28. Denied as untrue.
- 29. Denied as untrue.
- 30. Denied as untrue.
- 31. Denied as untrue.
- 32. Denied as untrue.
- 33. No response needed.
- 34. No response needed.

Respectfully submitted,

THE MASTROMARCO FIRM

Dated: November 30, 2012

s/Victor J. Mastromarco, Jr.

VICTOR J. MASTROMARCO, JR. (P34564)

Attorneys for Plaintiff

1024 N. Michigan Avenue

Saginaw, Michigan 48602

(989) 752-1414

vmastromar@aol.com

PROOF OF SERVICE

A copy of the foregoing has been electronically filed on November 30, 2012. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system and parties may access this filing through the Court's system.

Dated: November 30, 2012

s/Victor J. Mastromarco, Jr.

VICTOR J. MASTROMARCO, JR. (P34564)

Attorneys for Plaintiff

1024 N. Michigan Avenue

Saginaw, Michigan 48602

(989) 752-1414

vmastromar@aol.com